

Exhibit C

From: [Harkins, Steven M. \(Assoc-ATL-LT\)](#)
To: ["Conlee Whiteley"; sagoldberg@duanemorris.com](#)
Cc: [Cohen, Lori \(Shld-Atl-LT\); Lockard, Victoria D. \(Shld-Atl-LT\); ASlater@mazieslater.com; Rubenstein, Brian \(Shld-PHIL-LT\); Geoppinger, Jeff; valpec@kirtlandpackard.com; JPriselac@duanemorris.com; cct@pietragallo.com; sarah.johnston@btlaw.com](#)
Subject: RE: Valsartan - Agenda Items for January 27th CMC
Date: Monday, January 25, 2021 12:05:00 PM
Attachments: [image003.png](#)
[image001.png](#)

Counsel,

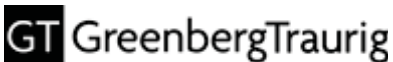
Thank you for your email. Can you please clarify what issues Plaintiffs intend to raise for items 3 and 4? We can of course give a general overview of document productions to date if that is what's intended, but Defendants are not aware of outstanding document production disputes that are ready to be raised with the Court on Wednesday.

Specifically, do these items apply to Defendants at particular levels of the supply chain or specific Defendants, and are the issues you intend to raise items about which the parties have met and conferred? Please let us know so that we can make sure the right party is prepared to respond appropriately.

Best,

Steven M. Harkins
Associate

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From: Conlee Whiteley <c.whiteley@kanner-law.com>
Sent: Sunday, January 24, 2021 6:44 PM
To: Harkins, Steven M. (Assoc-ATL-LT) <harkinss@gtlaw.com>; sagoldberg@duanemorris.com
Cc: Cohen, Lori (Shld-Atl-LT) <CohenL@gtlaw.com>; Lockard, Victoria D. (Shld-Atl-LT) <lockardv@gtlaw.com>; ASlater@mazieslater.com; Rubenstein, Brian (Shld-PHIL-LT) <rubensteinb@gtlaw.com>; Geoppinger, Jeff <jgeoppinger@ulmer.com>; valpec@kirtlandpackard.com; JPriselac@duanemorris.com; cct@pietragallo.com; sarah.johnston@btlaw.com
Subject: Re: Valsartan - Agenda Items for January 27th CMC

EXTERNAL TO GT

Counsel: Please see below the agenda items from Plaintiffs.

1. ZHP Schedule
2. Update on Deposition Schedules

- a. Aurobindo
 - b. Teva
 - c. Torrent
3. Aurobindo Document Production
4. Summary of Defendants' Document Production
5. Update on Wholesaler Defendants T3 Data Stipulation
6. Short Form Complaints for Losartan and Irbesartan and Implementing orders; Service of Process on Defendants
7. Filing of Amended Complaints.

Thank you,

Conlee

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From: "harkinss@gtlaw.com" <harkinss@gtlaw.com>
Date: Friday, January 22, 2021 at 5:22 PM
To: Adam Slater <ASlater@mazieslater.com>, Valsartan PEC <valpec@kirtlandpackard.com>
Cc: "CohenL@gtlaw.com" <CohenL@gtlaw.com>, "lockardv@gtlaw.com" <lockardv@gtlaw.com>, "rubensteinb@gtlaw.com" <rubensteinb@gtlaw.com>, "sagoldberg@duanemorris.com" <SAGoldberg@duanemorris.com>,

"JPriselac@duanemorris.com" <JPriselac@duanemorris.com>, "cct@pietragallo.com" <cct@pietragallo.com>, "sarah.johnston@btlaw.com" <sarah.johnston@btlaw.com>

Subject: Valsartan - Agenda Items for January 27th CMC

Adam,

Below is Defendants' list of proposed agenda items for next week's CMC. Please let us know if Plaintiffs have additional items they wish to raise with the Court. We also propose that the parties agree to submit their position statements at 12:00 p.m. EST on Tuesday, January 26th, 2021. Judge Schneider previously entered some orders with specific instructions on timing for individual conferences, but we do not believe there is anything in place for next week.

1. Consumer EL and MM Class Representatives' Amended Responses and Objections to Rule 34 Requests
2. Parties' Agreement on Bellwether Pool Selection and Proposed Order
3. State Court Coordination Order
4. Schedule and Plan for Ongoing Mid-Month Teleconferences
5. Proposed Litigation Overview to Magistrate Williams and Special Master Vanaskie
6. Plaintiff Fact Sheet Deficiencies and Orders to Show Cause

Best,

Steven M. Harkins
Associate

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